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8 Attorneys for Defendant
9 HUBER RUIZ MALDONADO

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE NORTHER DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,)	No. CR 15-0371 JST
)	
13 Plaintiff,)	
)	
14 v.)	STIPULATION AND proposed
)	ORDER TO CONTINUE STATUS
)	HEARING
15 HUBER RUIZ MALDONADO,)	
)	DATE: October 9, 2015
16 Defendant.)	TIME: 9:30 a.m.
)	

17
18
19 Huber Ruiz Maldonado is charged with one codefendant, his brother Jose Ruiz
20 Maldonado in this action. Huber Ruiz Maldonado is charged with one drug offense, while Jose
21 Ruiz Maldonado is charged with three drug offenses. The two defendants are not charged
22 together in any of the counts in the Indictment.

23
24 Huber Ruiz Maldonado was released from custody and remains on pretrial supervision.
25 Jose Ruiz Maldonado has been detained.

26 Both defendants are scheduled to make their second appearance before this Court on
27 October 9, 2015 for Status. The government has provided to both counsel considerable
28 discovery, including video and audio recordings, agent reports, laboratory reports, etc. regarding

1 the government's investigation over a period of just under one year. Undersigned counsel for
2 Huber Ruiz Maldonado had hoped to complete a review of the discovery before the upcoming
3 Status appearance and also to review those materials with Huber Ruiz Maldonado to determine if
4 negotiations with the government to settle this matter should be undertaken or if setting pretrial
5 motions was appropriate. However, while counsel has reviewed most of the discovery, counsel
6 has not completed that review and has only had limited discussions with Huber Ruiz Maldonado
7 to date, in large part due to the discharge of his duties for other clients. It appears that counsel
8 will be able to inform this Court more accurately of the likely direction of this matter if some
9 additional time is provided prior to the next appearance.
10

11 Undersigned counsel, however, will be out of the country for approximately three weeks
12 starting October 18, 2015 and will not be available to work on this matter during that period.
13

14 Counsel for Jose Ruiz Maldonado has informed undersigned counsel and counsel for the
15 government that Jose Ruiz Maldonado at this time has voiced the wish to address the Court about
16 his concerns about his counsel. Thus, Jose Ruiz Maldonado will appear on October 9, 2015 to
17 address at least that issue.
18

19 For those reasons, the parties STIPULATE to continue the Status hearing as to Huber
20 Ruiz Maldonado to December 11, 2015 at 9:30 a.m.

21 Counsel for the defendant and the government further stipulate that time should be
22 excluded between those dates for effective preparation of counsel and continuity of defense
23 counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). Furthermore, the parties agree that the ends of justice
24 served by granting such a continuance outweigh the best interests of the public and the defendant
25 in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).
26
27
28

1 IT IS SO STIPULATED.

2 DATED: October 8, 2015

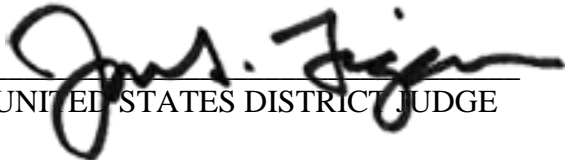
_____/s/_____
Frank Riebli
Assistant United States Attorney

5 DATED: October 8, 2015

_____/s/_____
Scott A. Sugarman
Attorney for Huber Ruiz Maldonado

7 SO ORDERED.

8 DATED: October 8, 2015



UNITED STATES DISTRICT JUDGE